## **Appendix - List of Commenters**

## Abbreviation -- Commenter

- 1. Advisory Committee ISO-NE -- Advisory Committee to the Board of Directors of ISO New England
- 2. AEP -- American Electric Power Service Corporation and its public utility operating company subsidiaries: Appalachian Power Company, Columbus Southern Power Company, Indiana Michigan Power Company, Kentucky Power Company, Kingsport Power Company, Ohio Power Company and Wheeling Power Company
- 3. AEPCO -- Arizona Electric Power Cooperative, Inc.
- 4. Alabama Commission -- Alabama Public Service Commission
- 5. Alberta -- Provence of Alberta, Electricity Branch
- 6. Allegheny -- Allegheny Energy, Inc.
- 7. Alliance Companies -- American Electric Power Service Corporation, Consumers Energy Company, Detroit Edison Company, FirstEnergy Corp. and Virginia Electric and Power Company
- 8. Alliant Energy -- Alliant Energy Corporation
- 9. Aluminum Companies -- Alcoa Inc., Columbia Falls Aluminum Company, Kaiser Aluminum & Chemical Corporation and Vanalco, Inc.
- 10. American Forest -- American Forest & Paper Association
- 11. AMP-Ohio -- American Municipal Power-Ohio, Inc.
- 12. APPA -- American Public Power Association
- 13. APPA <u>et al.</u> (WP) -- Legal White Paper prepared on behalf of and sponsored jointly by the American Public Power Association, the Electric Consumers Resource Council, the Transmission Access Policy Study Group and the Transmission Dependent Utility Systems
- 14. APS -- Arizona Public Service Company
- 15. APX -- Automated Power Exchange, Inc.
- 16. Arizona Authority -- Arizona Power Authority
- 17. Arizona Commission -- Arizona Corporation Commission
- 18. Arizona ISA -- Arizona Independent Scheduling Administrator Association
- 19. Arkansas Cities -- Cities of Benton, Bentonville, North Little Rock, Osceola, Piggott, Prescott and Siloam Springs, Arkansas; the Clarksville Light and Water Company; Conway Corporation; Hope Water and Light Commission; City Water

- and Light Plant of the City of Jonesboro, Arkansas; Paragould Light and Water Commission; and the West Memphis, Arkansas Utilities Commission
- 20. Arkansas Consumers -- Arkansas Electric Energy Consumers
- 21. Avista -- Avista Corporation, Inc.
- 22. Bangor Hydro -- Bangor Hydro-Electric Company
- 23. BC Hydro -- British Columbia Hydro & Power Authority
- 24. Big Rivers -- Big Rivers Electric Corporation
- 25. Blue Ridge -- Blue Ridge Power Agency
- 26. Brattle Group -- The Brattle Group (Peter Fox-Penner and Philip Hanser)
- 27. British Columbia Ministry -- British Columbia, Canada, Ministry of Employment and Investment, Electricity Development Branch
- 28. Cal DWR -- California Department of Water Resources
- 29. Cal ISO -- California Independent System Operator Corporation
- 30. California Board -- California Electricity Oversight Board
- 31. California Commission -- Public Utilities Commission of the State of California
- 32. CalPX -- California Power Exchange Corporation
- 33. CAMU -- Colorado Association of Municipal Utilities
- 34. Canada DNR -- Canada Department of Natural Resources
- 35. CCEM/ELCON -- Coalition for a Competitive Electricity Market and the Electricity Consumers Resources Council
- 36. CEA -- Canadian Electricity Association
- 37. Consumers Energy -- Consumers Energy Company
- 38. Central Maine -- Central Maine Power Company and Maine Electric Power Company
- 39. Champion -- Champion International Corporation
- 40. Chelan -- Public Utility District No. 1 of Chelan County
- 41. Cinergy -- Cinergy Services, Inc.
- 42. Clarksdale -- Clarksdale Public Utilities Commission
- 43. Cleco -- Cleco Corporation
- 44. Cleveland -- City of Cleveland, Ohio
- 45. CMUA -- California Municipal Utilities Association
- 46. Coalition of Alliance Users -- Coalition of Municipal and Cooperative Users of Alliance Companies' Transmission
- 47. ComEd -- Commonwealth Edison Company
- 48. Conectiv -- Conectiv (Atlantic City Electric Company and Delmarva Power & Light Company
- 49. Conlon -- Mr. P. Gregory Conlon
- 50. Consumer Groups -- Industrial Consumers, American Public Power Association, National Rural Electric Cooperative Association, Transmission Access Policy

Study Group, Transmission Dependent Utility Systems, Consumer Federation of America and International Mass Retail Association

- 51. CP&L -- Carolina Power & Light Company
- 52. CRC -- Colorado River Commission of the State of Nevada
- 53. CREDA -- Colorado River Energy Distributors Association
- 54. CSU -- Colorado Springs Utilities
- 55. CTA -- Competitive Transmission Association, Inc.
- 56. Dalton Utilities -- Board of Water, Light and Sinking Fund Commissioners of the City of Dalton, Georgia
- 57. Dairyland -- Dairyland Power Cooperative
- 58. Desert STAR -- Desert STAR
- 59. Detroit Edison -- Detroit Edison Company
- 60. Distributed Power -- Distributed Power Coalition of America
- 61. DOE -- United States Department of Energy
- 62. Dr. Illic -- Dr. Marija Illic and Yong Yoon
- 63. Duke -- Duke Energy Corporation
- 64. Duquesne -- Duquesne Light Company
- 65. Dynegy -- Dynegy Inc.
- 66. EAL -- ESBI Alberta Ltd.
- 67. East Kentucky -- East Kentucky Power Cooperative, Inc.
- 68. East Texas Cooperatives -- East Texas Electric Cooperative, Inc., Northeast Texas Electric Cooperative, Inc., Sam Rayburn G&T Electric Cooperative, Inc., Tex-La Electric Cooperative of Texas, Inc.
- 69. ECAR -- East Central Area Reliability Council
- 70. EEI -- Edison Electric Institute
- 71. EME -- Edison Mission Energy
- 72. Empire District -- Empire District Electric Company
- 73. Enron/APX/Coral Power -- Enron Power Marketing, Inc., Automated Power Exchange and Coral Power, L.L.C.
- 74. Entergy -- Entergy Services Inc.
- 75. EPA -- United States Environmental Protection Agency
- 76. EPRI -- Electric Power Research Institute
- 77. EPSA -- Electric Power Supply Association
- 78. Eric Hirst -- Mr. Eric Hirst
- 79. Fertilizer Institute -- The Fertilizer Institute
- 80. First Rochdale -- 1st Rochdale Cooperative Group, Ltd.
- 81. FirstEnergy -- FirstEnergy Corp.
- 82. Florida Commission -- Florida Public Service Commission
- 83. Florida Power Corp. -- Florida Power Corporation
- 84. FMPA -- Florida Municipal Power Agency

- 85. FP&L -- Florida Power & Light Company
- 86. FTC -- Staff of the Bureau of Economics of the Federal Trade Commission
- 87. Gainesville -- Gainesville Regional Utilities
- 88. Georgia Transmission -- Georgia Transmission Corporation
- 89. GPU Energy -- GPU Energy
- 90. Grand Council et al. -- Grand Council of the Crees, Greenpeace Canada, the Sierra Club of Canada, Mouvement Au Courant, the Centre D'Analyses de Politiques Energetiques and New England Coalition for Energy Efficiency and the Environment
- 91. Great River -- Great River Energy
- 92. H.Q. Energy Services -- Energy Services Group of Hydro-Quebec and H.Q. Energy Services (U.S.) Inc.
- 93. How Group -- OASIS How Working Group
- 94. ICUA -- Idaho Consumer-Owned Utilities Association
- 95. Idaho Commission -- Idaho Public Utilities Commission
- 96. Idaho Power -- Idaho Power Company
- 97. Illinois Commission -- Illinois Commerce Commission
- 98. IMEA -- Illinois Municipal Electric Agency
- 99. IMPA -- Indiana Municipal Power Agency
- 100. Indiana Commission -- Indiana Utility Regulatory Commission
- 101. Indianapolis P&L -- Indianapolis Power & Light Company
- 102. Industrial Consumers -- Electricity Consumers Resource Council, the American Iron & Steel Institute and the Chemical Manufactures Association
- 103. Industrial Customers -- Industrial Customers of Northwest Utilities
- 104. INGAA -- Interstate Natural Gas Association of America
- 105. Iowa Board -- Iowa Utilities Board
- 106. IPCF -- International Powerline Communications Forum
- 107. ISO-NE -- ISO New England Inc.
- 108. JEA -- JEA
- 109. Justice Department -- United States Department of Justice
- 110. Kentucky Commission -- Kentucky Public Service Commission
- 111. Konolige/Ford/Fleishman -- Kit Konolige, Daniel F. Ford and Steven I. Fleishman
- 112. Lenard -- Mr. Thomas M. Lenard
- 113. LEPA -- Louisiana Energy & Power Authority
- 114. LG&E -- LG&E Energy Corp.
- 115. Lincoln -- Lincoln, Nebraska Electric System
- 116. LIPA -- Long Island Power Authority
- 117. Los Angeles -- Los Angeles Department of Water and Power
- 118. Loveland Customers -- Loveland Area Customers Association
- 119. LPPC -- Large Public Power Council

- 120. Manitoba Board -- Manitoba Hydro-Electric Board
- 121. MAPP -- Mid-Continent Area Power Pool
- 122. Mass Companies -- Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company
- 123. Massachusetts Division -- Massachusetts Division of Energy Resources
- 124. MEAG -- Municipal Electric Authority of Georgia
- 125. Merrill Energy -- Merrill Energy LLC
- 126. Metropolitan -- Metropolitan Water District of Southern California
- 127. Michigan Commission -- Michigan Public Service Commission
- 128. MidAmerican -- MidAmerican Energy Company
- 129. Mid-Atlantic Commissions -- Delaware Public Service Commission, District of Columbia Public Service Commission, Maryland Public Service Commission, New Jersey Board of Public Utilities and Pennsylvania Public Utility Commission
- 130. Midwest Energy -- Midwest Energy, Inc.
- 131. Midwest ISO -- Midwest Independent Transmission System Operator, Inc.
- 132. Midwest ISO Participants -- Allegheny Energy, Ameren, Central Illinois Light Company, Cinergy Corp., Commonwealth Edison Company, Hoosier Energy Rural Electric Cooperative, Inc., Illinois Power Company, Kentucky Utilities Company, Louisville Gas & Electric Company, Southern Indiana Gas & Electric Company, Southern Illinois Power Cooperative, Wabash Valley Power Association, Inc. and Wisconsin Electric Power Company
- 133. Midwest Municipals -- Missouri River Energy Services, Iowa Association of Municipal Utilities and Minnesota Municipal Utilities Association
- 134. Minnesota Commission -- Minnesota Public Utilities Commission
- 135. Minnesota Power -- Minnesota Power
- 136. Missouri Commission -- Missouri Public Service Commission
- 137. MLGW -- Memphis Light, Gas and Water Division
- 138. Montana Commission -- Montana Public Service Commission and Montana Department of Environmental Quality
- 139. Montana Power -- Montana Power Company
- 140. Montana-Dakota -- Montana-Dakota Utilities Co.
- 141. NARUC -- National Association of Regulatory Utility Commissioners
- 142. NASUCA -- National Association of State Utility Consumer Advocates
- 143. NCPA -- Northern California Power Agency
- 144. NEMA -- National Energy Marketers Association
- 145. NECPUC -- New England Conference of Public Utilities Commissioners, Inc.
- 146. NEPCO <u>et al.</u> -- New England Power Company, National Grid Group, plc and Montaup Electric Company
- 147. NERA -- National Economic Research Associates, Inc.
- 148. NERC -- North American Electric Reliability Council

- 149. Nevada Commission -- Public Utilities Commission of Nevada
- 150. New Century -- New Century Energies, Inc. and its operating utility companies: Public Service Company of Colorado, Southwestern Public Service Company and Cheyenne Light, Fuel and Power Company
- 151. New Orleans -- Council of the City of New Orleans
- 152. New Smyrna Beach -- Utilities Commission, City of New Smyrna Beach, Florida
- 153. New York Commission -- New York State Public Service Commission
- 154. Nine Commissions -- Pennsylvania Public Utility Commission, Virginia State Corporation Commission, Public Utilities Commission of Ohio, Indiana Utility Regulatory Commission, Illinois Commerce Commission, Michigan Public Service Commission, Missouri Public Service Commission, Arkansas Public Service Commission and Oklahoma Corporation Commission
- 155. NiSource -- NiSource Incorporated
- 156. NJBUS -- New Jersey Business Users
- 157. NMA/WFA/CEED -- National Mining Association, Western Fuels Association, Inc. and Center for Energy and Economic Development
- 158. NU -- Northeast Utilities System
- 159. Northwest Council -- Northwest Power Planning Council
- 160. NPCC -- Northeast Power Coordinating Council
- 161. NPPD -- Nebraska Public Power District
- 162. NPRB -- Nebraska Power Review Board
- 163. NRECA -- National Rural Electric Cooperative Association
- 164. NSP -- Northern States Power Company
- 165. NU -- Northeast Utilities System
- 166. NWCC -- National Wind Coordinating Committee
- 167. NY ISO -- New York Independent System Operator, Inc.
- 168. NYC -- City of New York
- 169. NYEBF -- New York Energy Buyers Forum
- 170. NYMEX -- New York Mercantile Exchange
- 171. NYPP -- Member Systems of the New York Power Pool (Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., Long Island Power Authority, New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation, Orange and Rockland Utilities, Inc., Rochester Gas and Electric Corp. and Power Authority of the State of New York)
- 172. Oglethorpe -- Oglethorpe Power Corporation
- 173. Ohio Commission -- Public Utilities Commission of Ohio
- 174. Oneok -- Oneok Power Marketing
- 175. Ontario IMO -- Ontario Independent Electricity Market Operator
- 176. Ontario Power -- Ontario Power Generation Inc.
- 177. Oregon Office -- Oregon Office of Energy

- 178. Otter Tail -- Otter Tail Power Company
- 179. PacifiCorp -- PacifiCorp
- 180. PECO -- PECO Energy Company and Horizon Energy
- 181. Pennsylvania Commission -- Pennsylvania Public Utility Commission
- 182. PG&E -- PG&E Corporation
- 183. PGE -- Portland General Electric Company
- 184. PGP -- Public Generating Pool
- 185. PJM -- PJM Interconnection, L.L.C.
- 186. PJM/NEPOOL Customers -- PJM Industrial Customer Coalition, NEPOOL Industrial Customer Coalition and Coalition of Midwest Transmission Customers
- 187. Platte River -- Platte River Power Authority
- 188. PNGC -- Pacific Northwest Generating Cooperative
- 189. Powerex -- British Columbia Power Exchange Corporation
- 190. PP&L Companies -- PP&L Inc., PP&L EnergyPlus Co., L.L.C., PP&L Montana, L.L.C.
- 191. PPC -- Public Power Council
- 192. Professor Hogan -- Professor William W. Hogan
- 193. Professor Joskow -- Professor Paul L. Joskow
- 194. Professor Koch -- Professor Charles H. Koch, Jr.
- 195. Project Groups -- Alliance for Affordable Energy, American Wind Energy Association, Center for Clean Air Policy, Center for Energy Efficiency and Renewable Technologies, Citizen Power, Inc., Citizens for Pennsylvania's Future, Delaware Division of the Public Advocate, Environmental Law & Policy Center of the Midwest, Land & Water Fund of the Rockies, Legal Environmental Assistance Foundation, Minnesotans for an Energy-Efficient Economy, Natural Resources Defense Council, Northwest Energy Coalition, Office of the People's Counsel of the District of Columbia, Pace Energy Project, Pennsylvania Energy Project, Public Citizen, PJM Public Interest/Environmental User Group, Renew Wisconsin, Southern Environmental Law Center, Tennessee Valley Energy Reform Coalition, Union of Concerned Scientists, Wisconsin's Environmental Decade
- 196. PSE&G -- Public Service Electric and Gas Company
- 197. PSNM -- Public Service Company of New Mexico
- 198. Public Citizen -- Public Citizen
- 199. Puget -- Puget Sound Energy, Inc.
- 200. Rayburn -- Rayburn Country Electric Cooperative, Inc.
- 201. RECA -- Residential Electric Consumers Association
- 202. Reliant -- Reliant Energy, Incorporated
- 203. RUS -- Rural Utilities Service of the Department of Agriculture
- 204. Salomon Smith Barney -- Global Power Group of Salomon Smith Barney
- 205. San Francisco -- City and County of San Francisco

- 206. SCE&G -- South Carolina Electric & Gas Company
- 207. Seattle -- Seattle City Light Department
- 208. SERC -- Southeastern Electric Reliability Council
- 209. Sierra Pacific -- Sierra Pacific Resources, Inc.
- 210. Sithe -- Sithe Energies, Inc.
- 211. SMUD -- Sacramento Municipal Utility District
- 212. Snohomish -- Public Utility District No. 1 of Snohomish County, Washington
- 213. SNWA -- Southern Nevada Water Authority
- 214. SoCal Cities -- Cities of Anaheim, Azusa, Banning, Colton, and Riverside, California
- 215. SoCal Edison -- Southern California Edison Company
- 216. Sonat -- Sonat Power Marketing, L.P.
- 217. South Carolina Authority -- South Carolina Public Service Authority
- 218. South Carolina Commission -- Public Service Commission of South Carolina
- 219. Southern Company -- Southern Company Services, Inc. acting as agent for Alabama Power Company, Georgia Power Company, GulfPower Company, Mississippi Power Company and Savannah Electric and Power Company
- 220. SPP -- Southwest Power Pool, Inc.
- 221. SPRA -- Southwestern Power Resources Association
- 222. SRP -- Salt River Project Agricultural Improvement and Power District
- 223. St. Joseph -- St. Joseph Light & Power Company
- 224. Statoil -- Statoil Energy, Inc.
- 225. STDUG -- Southwest Transmission Dependent Utility Group
- 226. Steel Dynamics -- Steel Dynamics, Inc.
- 227. Tacoma Power -- City of Tacoma, Department of Public Utilities, Light Division
- 228. Tallahassee -- City of Tallahassee, Florida
- 229. Tampa Electric -- Tampa Electric Company
- 230. TANC -- Transmission Agency of Northern California
- 231. TAPS -- Transmission Access Policy Study Group
- 232. TDU Systems -- Alabama Electric Cooperative, Inc., Arkansas Electric Cooperative Corporation, Golden Spread Electric Cooperative, Kansas Electric Power Cooperative, Inc., North Carolina Electric Membership Corporation, Old Dominion Electric Cooperative, Seminole Electric Cooperative, Inc. and South Mississippi Electric Power Association
- 233. Tennessee Authority -- Tennessee Regulatory Authority
- 234. TEP -- Tucson Electric Power Company
- 235. Texas Commission -- Public Utility Commission of Texas
- 236. Trans-Elect -- Trans-Elect, Inc.
- 237. Transénergie -- Transénergie

- 238. Transmission ISO Participants -- Baltimore Gas & Electric, Boston Edison Company, Cambridge Electric Light Company, Commonwealth Energy Company, Conectiv, GPU Energy, Niagara Mohawk Power Company, Northeast Utilities Service Company, PECO Energy Company, PP&L, Inc., Potomac Electric Power Company, Public Service Electric and Gas Company, Vermont Electric Power Company, Inc.
- 239. Tri-State -- Tri-State Generation and Transmission Association, Inc.
- 240. Turlock -- Turlock Irrigation District
- 241. TVA -- Tennessee Valley Authority
- 242. TXU Electric -- TXU Electric Company
- 243. UAMPS -- Utah Associated Municipal Power Systems
- 244. UMPA -- Utah Municipal Power Agency
- 245. United Illuminating -- United Illuminating Company
- 246. UtiliCorp -- UtiliCorp United, Inc.
- 247. Utility Engineers -- Utility Economic Engineers
- 248. Vernon -- City of Vernon, California
- 249. Virginia Commission -- Virginia State Corporation Commission
- 250. Virginia Power -- Virginia Electric and Power Company
- 251. Washington Commission -- Washington Utilities and Transportation Commission
- 252. WEPCO -- Wisconsin Electric Power Company
- 253. WICF -- Western Interconnection Coordination Forum
- 254. Williams -- Williams Companies, Inc.
- 255. Wisconsin Commission -- Public Service Commission of Wisconsin
- 256. Wolverine Cooperative -- Wolverine Power Supply Cooperative, Inc.
- 257. WPPI -- Wisconsin Public Power, Inc.
- 258. WPSC -- Wisconsin Public Service Corporation
- 259. Wyoming Commission -- Wyoming Public Service Commission